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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

Christian Dejesus Caratachea,  
Plaintiff,  
vs.  
Kilolo Kijakazi, Acting  
Commissioner of Social Security,  
Defendant.

} Case No. 1:21-cv-00804-BAM

} STIPULATION AND  
ORDER FOR EXTENSION OF  
TIME

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 3-day extension of time, from December 17, 2021 to December 20, 2021, for Plaintiff to serve on defendant with PLAINTIFF'S LETTER BRIEF. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's first request for an extension of time. Counsel for Plaintiff mistakenly marked the task of serving the letter brief as completed however an audit revealed it had not yet been served. Although the brief was completed by

1 December 17, 2021, Counsel for Plaintiff did not serve it on Defendant until  
2 today's date.

3 Counsel had a short day on December 17, 2021 due to a company-wide  
4 holiday lunch that was planned with Counsel's staff. This led to the confusion  
5 within counsel's office. Defendant does not oppose the requested extension.  
6 Counsel apologizes to the Defendant and Court for any inconvenience this may  
7 cause.

8  
9 Respectfully submitted,

10 Dated: December 20, 2021 PENA & BROMBERG, ATTORNEYS AT LAW  
11

12 By: /s/ Jonathan Omar Pena  
13 JONATHAN OMAR PENA  
14 Attorneys for Plaintiff

15  
16 Dated: December 20, 2021 PHILLIP A. TALBERT  
17 Acting United States Attorney  
18 LISA A. THOMAS  
19 Regional Chief Counsel, Region VII  
20 Social Security Administration

21 By: \*/s/ Jeffrey E. Staples  
22 Jeffrey E. Staples  
23 Special Assistant United States Attorney  
24 Attorneys for Defendant  
25 (\*As authorized by email on December 20, 2021)  
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## ORDER

Pursuant to the parties' stipulation, and cause appearing, Plaintiff's request for an extension of time to December 20, 2021, to serve Defendant with Plaintiff's confidential Letter Brief is GRANTED nunc pro tunc.

IT IS SO ORDERED.

Dated: **December 21, 2021**

/s/ Barbara A. McAuliffe

UNITED STATES MAGISTRATE JUDGE